

MAY 25

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

LISA LYNETTE CORNELIOUS

CASE NO.

18-1417-CBD

UNDER SEAL

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AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT  
AND ARREST WARRANT

I, Postal Inspector Nichole Rodriguez, being first duly sworn, hereby depose and state as follows:

1. I am a Postal Inspector for the United States Postal Inspection Service, assigned to the Washington Division and currently stationed at the Washington, DC Domicile. I have held this position since June 2012. I am currently assigned to conduct investigations involving postal crimes and violations of the federal code, including bank fraud, aggravated identity theft, and mail theft.

2. The facts set forth in this affidavit are based on my own personal knowledge, information obtained from other individuals including other law enforcement officers, interviews of witnesses, documents and records, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This Affidavit is submitted in support of a criminal complaint charging **Lisa Lynette Cornelious (CORNELIOUS)** with violating 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C. § 1349 (Conspiracy), 18 U.S.C. § 1028A (Aggravated Identity Theft), and 18 U.S.C. § 1956 (Money Laundering).

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4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of the application for a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause that **CORNELIOUS** violated the offenses listed above.

**PROBABLE CAUSE**

5. In December 2016, the United States Postal Inspection Service received several complaints from multiple financial institutions' investigators relating to stolen business checks being negotiated through fraudulent business accounts that appeared to have been established for the sole purpose of negotiating those stolen checks. The bank accounts were opened under business names that were recently incorporated in the states of Delaware, Maryland, Virginia, and the District of Columbia. The investigation revealed the **CORNELIOUS** and other co-conspirators created at least 6 sham businesses, including Lanzone Innovative Consulting Firm Inc; Onestar Engineering Firm; Wright's One Consulting; Johnson One Constructing, LLC; Metcalf Construction LLC; and A-L Abatement, opened at least 12 bank accounts in the names of these sham businesses, fraudulently withdrew money from these bank accounts using compromised identities of other individuals, and laundered money through these business bank accounts through at least 8 financial institutions.

## FINANCIAL INSTITUTIONS

6. SunTrust Bank (SunTrust), Bank of America, PNC Financial Services Group ("PNC"), BB&T Bank ("BB&T"), Wells Fargo Bank ("Wells Fargo"), United Bank, Citibank, M&T Bank (M&T) are all financial institutions within the meaning of 18 U.S.C. § 20.

### SUNTRUST – LANZONE INNOVATIVE CONSULTING FIRM, INC. (ACCOUNT-1 AND ACCOUNT-2)

7. On or about September 27, 2016, Lanzone Innovative Consulting Firm Inc., purportedly located in Upper Marlboro, Maryland was registered as a corporation with the State of Maryland. The resident agent was listed as Victim 1, at the same purported address as the business in Upper Marlboro, Maryland.

8. On or about October 6, 2016, an individual purporting to be Victim 1 opened two SunTrust business accounts at the SunTrust branch in Camp Springs, Maryland, one account ending in 8738 (ACCOUNT-1) and the second account ending in 8720 (ACCOUNT-2). Both accounts used the name of Lanzone Innovative Consulting Firm Incorporated. The authorized signer for both accounts was listed as Victim 1. The opening deposit for each account was \$150.00. Photographs of the individual opening ACCOUNT-1 and ACCOUNT-2 were produced from SunTrust security surveillance video and depicted an African American male, with short dark hair and a dark beard.

9. On or about October 8, 2016, United States Treasury check number ending in 2654 ("Treasury check") in the amount of \$993,176 was deposited into ACCOUNT-1 at a SunTrust branch in Upper Marlboro, Maryland. The Treasury check was a tax refund check made payable to Victim 1 and his spouse in Alamo, CA. Surveillance photos from the Sun Trust Upper Marlboro, Maryland branch show **CORNELIOUS** depositing the Treasury check into

ACCOUNT-1. Victim 1 told law enforcement officers that he was a victim of a data breach at his Certified Public Accountants (CPA's) office. Victim 1 stated he did not file an income tax return seeking a refund in the amount of \$993,176. Victim 1 also stated that he did not open or authorize anyone to open ACCOUNT-1 or ACCOUNT-2 in his name and he is not affiliated with a business named Lanzone Innovated Consulting Firm.

10. On or about October 14, 2016, \$431,715.00 was transferred from ACCOUNT-1 to ACCOUNT-2.

**BANK OF AMERICA – ONESTAR ENGINEERING FIRM (ACCOUNT-3)**

11. On or about October 11, 2016, an individual purporting to be Michael A. Smith opened Bank of America Business Checking Account number ending 0739 (ACCOUNT-3) in the name of Onestar Engineering Firm at the Bank of America in Washington, DC. ACCOUNT-3 was opened with a \$100.00 deposit

12. On or about October 14, 2016, SunTrust check number 2002 in the amount of \$94,366.27 and drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated (ACCOUNT-2), was deposited into ACCOUNT-3 at a Bank of America ATM in Alexandria, Virginia. Still photographs from the Bank of America surveillance video of the individual depositing check number 2002 show an African American male, with a short beard, wearing a diamond print sweater and glasses.

13. Between October 14, 2016 and November 1, 2016, funds were withdrawn from ACCOUNT-3 in the form of cash withdrawals, a wire transfer, and several Bank of America cashier's checks. The cashier's checks were made payable to several names including, Diane Russell. Cashier's check number ending in 0595 in the amount of \$4,572.50, was made payable to Diane Russell. On November 2, 2016, **CORNELIOUS** purporting to be Diane Russell,

cashed cashier's check number ending in 0595 at Bank of America located in Bowie, MD. A photograph of the transaction depicts an individual matching the likeness and description of **CORNELIOUS**.<sup>1</sup>

**PNC BANK – WRIGHT'S ONE CONSULTING FIRM LLC (ACCOUNT-4)**

14. On or about September 28, 2016, Wright's One Consulting Firm LLC, purportedly located in Arlington, Virginia was registered as a limited liability company with the State of Virginia. The registered agent was listed as Tabitha L. Wright with the same address in Arlington, Virginia.

15. On October 5, 2016, **CORNELIOUS** purporting to be Tabitha L. Wright, opened PNC Bank Business Checking Account ending 4668 (ACCOUNT-4) in the name of Wright's One Consulting Firm LLC at the PNC Branch located in Alexandria, Virginia. The authorized signer is listed as Tabitha L. Wright. The account was opened with \$100.00. A photograph of the individual opening ACCOUNT- 4 matches the likeness and description of **CORNELIOUS**.

16. On October 14, 2016, **CORNELIOUS** deposited SunTrust check number 1002, drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated, ACCOUNT-1 and made payable to Wright's One Consulting Firm in the amount of \$86,723.45 into ACCOUNT- 4 at the PNC branch in Washington, DC. A photograph of the individual presenting check number 1002 depicts an individual matching the likeness and description of **CORNELIOUS**.

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<sup>1</sup> As described later in this affidavit, Cornelious was interviewed by law enforcement on July 25, 2017 after she was arrested attempting to open a bank account in furtherance of the scheme. She eventually provided her true name. Law enforcement officers reviewed surveillance photos and made the identification of Cornelious based upon this face-to-face interview.

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17. On October 21, 2016, **CORNELIOUS** withdrew **\$14,212.87** from **ACCOUNT-4** at the PNC Bank in Alexandria, Virginia. The withdrawal ticket contained what appeared to be an endorsement of Tabitha Wright. A photograph of the withdrawal transaction depicts an individual matching the likeness and description of **CORNELIOUS**.

18. Between October 14, 2016 and November 1, 2016, additional funds were withdrawn from **ACCOUNT- 4** in the form of cash withdrawals, a debit, and several PNC cashier's checks. The cashier's checks were made payable to several names including, Cindy Lane and Diane Russell.

**BB&T BANK – JOHNSON ONE CONSTRUCTION LLC (ACCOUNT-5)**

19. On or about October 11, 2016, Johnson One Construction LLC purportedly located in Riverdale, Maryland, was registered as a limited liability company with the State of Maryland. The registered agent was listed as Kevin Johnson with the same address as the business.

20. On October 13, 2016, an individual purporting to be Kevin Johnson opened a BB&T Business Value account ending 6876 (**ACCOUNT- 5**). The account was opened with a \$100.00 cash deposit. On October 21, 2016, SunTrust Bank check number 1003, in the amount of \$48,672.90 and drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated **ACCOUNT- 1**, and made payable to Johnson One Construction LLC, was deposited into **ACCOUNT- 5**.

21. On November 1, 2016, BB&T counter check 7253908 was issued to "cash" in the amount of \$5,181.00. Counter check 7253908 was endorsed Kevin Johnson.

22. On November 1, 2016, BB&T official check 5008859033 was issued to Diane Russell in the amount of \$5,171.00. According to BB&T records, on or about November 2,

2016, BB&T Official check 5008859033, issued to Diane Russell in the amount of \$5,171.00 was cashed at a BB&T branch. The individual presented what appeared to be Delaware driver's license #6781032, bearing **CORNELIOUS'** image and the name Diane Russell. According to the Delaware Division of Motor Vehicles (DMV), driver's license #6781032 is not a validly issued driver's license number.

23. On November 1, 2016, BB&T counter check 7253905 was issued to "cash" in the amount of \$5,310.00. Counter check 7253905 was endorsed Kevin Johnson.

24. On November 1, 2016, BB&T official check 5008859032, was issued to Kimberly D. Smith in the amount of \$5,300.00.

25. On November 1, 2016, BB&T counter check 7253907 was issued to "cash" in the amount of \$4,792.00. Counter check 7253907 was endorsed Kevin Johnson.

26. On November 1, 2016, BB&T official check 5008859031 was issued to Cindy M. Lane in the amount of \$4,782.00.

**WELLS FARGO BANK – METCALF CONSTRUCTION LLC (ACCOUNT-6)**

27. On or about September 29, 2016, Metcalf Construction LLC purportedly located in Alexandria, Virginia was registered as a limited liability company with the state of Virginia. The registered agent was listed as Todd Metcalf with the same address as the business in Alexandria, Virginia.

28. On or about October 11, 2016, someone purporting to be Todd Metcalf opened Wells Fargo Business Choice Checking ending in 4177 (ACCOUNT- 6) in the name of Metcalf Construction LLC at the Wells Fargo in Arlington, Virginia. ACCOUNT- 6 was opened with a \$25.00 deposit. Photographs of the individual opening ACCOUNT- 6 were produced from Wells Fargo security surveillance video. The individual captured in the photographs appears to be the

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same African American male, with short dark hair and a dark beard who opened ACCOUNT-1 and ACCOUNT- 2.

29. On October 21, 2016, CORNELIOUS deposited SunTrust check number 2003 in the amount of \$49,675.80, drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated ACCOUNT- 2, and made payable to Metcalf Construction LLC, into ACCOUNT- 6 at an ATM located in Alexandria, Virginia. Photographs of the individual depositing check number 2003 depict an individual matching the likeness and description of CORNELIOUS.

30. Between October 21, 2016 and November 4, 2016, funds were withdrawn from ACCOUNT- 6 in the form of cash withdrawals and two issued Wells Fargo cashier's checks.

**BB&T – METCALF CONSTRUCTION (ACCOUNT-7)**

31. On or about October 11, 2016, an individual purporting to be Todd Metcalf opened BB&T Bank Business Account ending 5066 (ACCOUNT-7) in the name of Metcalf Construction purportedly located in Alexandria, Virginia at the BB&T Branch located in Arlington, Virginia. The accounts were opened with a \$100.00 deposit.

32. On or about October 24, 2016, SunTrust check # 1004, in the amount of \$60,515.72, which was drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated ACCOUNT- 1 was deposited into ACCOUNT- 7.

33. Between October 11, 2016 and November 3, 2016, approximately \$9,880.00 was withdrawn from ACCOUNT- 7 in the form of a negotiated check made payable to cash and an issued BB&T counter check made payable to cash.



**UNITED BANK – WRIGHT’S ONE CONSULTING FIRM LLC (ACCOUNT-8)**

34. On or about October 14, 2016, **CORNELIOUS** purporting to be Tabitha L. Wright, opened United Bank Checking Account 81153667 in the name of Wright’s One Consulting Firm LLC, purportedly located in Arlington, Virginia, at the United Bank branch located in Alexandria, Virginia. The account was opened with a \$100.00 deposit. A photograph of the individual opening ACCOUNT- 8 depicts an individual matching the likeness and description of **CORNELIOUS**.

35. On or about October 24, 2016, SunTrust check 2004, in the amount of \$48,670.50, which was drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated ACCOUNT- 2, was deposited into ACCOUNT- 8.

36. Between October 24, 2016 and November 2, 2016, approximately \$29,588.46 was withdrawn from ACCOUNT- 8 in the form of cash withdrawals and four United Bank official checks made payable to names used in other parts of the scheme.

**CITIBANK – ONESTAR ENGINEERING FIRM (ACCOUNT-9)**

37. On or about October 13, 2016, an individual purporting to be Michael Smith opened Citibank Account 9250637896 (ACCOUNT- 9) in the name of Michael Smith T/A Onestar Engineering Firm, 718 Jefferson Street NW, Washington, DC 20011, at the Citibank located at 1060 Brentwood Road NE, Washington, DC 20018. ACCOUNT- 9 was opened with a \$75.00 deposit.

38. On or about October 27, 2016, SunTrust check 1005, in the amount of \$88,672.79, which was drawn on the fraudulent SunTrust Bank account in the name of Lanzone Innovative Consulting Firm Incorporated ACCOUNT- 1 was deposited into ACCOUNT- 9.

39. Between October 13, 2016 and November 4, 2016, approximately \$64,989.84 was withdrawn from ACCOUNT- 9, to include cash withdrawals, a wire transfer, and two issued Citibank official checks.

**BB&T – ONESTAR ENGINEERING FIRM (ACCOUNT-10)**

40. On or about October 11, 2016, an individual purporting to be Michael Smith opened BB&T Account 0005163248567 (ACCOUNT-10) in the name of Michael A. Smith, DBA Onestar Engineering Firm, 718 Jefferson Street NW, Washington, DC 20011, at BB&T located at 614 H Street NW, Washington, DC 20001. ACCOUNT- 10 was opened with a \$100.00 deposit.

41. On or about October 31, 2016, SunTrust check 2005, in the amount of \$85,672.77, which was drawn on ACCOUNT- 2 was deposited into ACCOUNT- 10.

42. BB&T Bank was able to detect the fraudulent funds before they were withdrawn from ACCOUNT- 10.

**AMERICAN PSYCHOLOGICAL ASSOCIATION CHECKS**

**M&T BANK – AMERICANS PSYCHOLOGICAL ASSOCIATION (ACCOUNT-11)**

43. On or about April 21, 2017, Americans Psychological Association was registered as a corporation with the state of Delaware. The registered agent was listed as Darrell G. Johnson with an address in Dover, Delaware.

44. On or about April 27, 2017, an individual purporting to be Darrell G. Johnson opened an M&T Account ending in 3085 (ACCOUNT- 11) in the name of Americans Psychological Association at the M&T Bank located in Dover, Delaware. ACCOUNT- 11 was opened with a \$250.00 deposit.

45. Between April 27, 2017 and approximately July 18, 2017, 26 checks made payable to the American Psychological Association were deposited into ACCOUNT- 11. The

checks were written from various business accounts to include BixVision, ED MAP, Pacific University Oregon, Grand Canyon University, Login Canada, University of Colorado, Villanova University, The Lewin Group, Inc., Sonic Media Solution Inc., Ingram Book Company, Southwest Behavioral Health Services, Duquesne University, ProQuest, Partners Healthcare, New harbinger Publications, Inc., South Arkansas Reginal Health Center, Inc., CHAC, Elizabeth H. Faulk Foundation, Inc., Sarah Reed Children's Center, Holcomb Behavioral Health Systems, Colorado State University, Albertus Magnus College, Midwest Collaborative For Library Services, The Chicago School California Inc., SAGE, and YourMemberShip.com, Inc. These checks totaled approximately \$266,434.30.

46. Between May 3, 2017 and July 17, 2017, several checks were written and negotiated against ACCOUNT- 11. These checks totaled approximately \$227,334.59 and were deposited into several different business bank accounts including a PNC Bank account in the name of A-L Abatement Inc.

47. Several of the businesses, whose checks were deposited into ACCOUNT- 11, later reported the checks were stolen after they had been mailed to the American Psychological Association in Washington, DC. These businesses reported the intended recipients never received their checks, but the checks were negotiated by someone else.

**PNC BANK – A-L ABATEMENT INC (ACCOUNT-12)**

48. On or about April 26, 2017, A-L Abatement, Inc. purportedly located in Arlington, Virginia was registered as a corporation with the State of Virginia. The registered agent was listed as Diane Smith with the same address in Arlington, Virginia as the business.

49. On or about May 1, 2017, an individual purporting to be Diane Smith opened PNC Bank Account ending in 5981 (ACCOUNT-12) in the name of A-L Abatement Inc.,

purportedly located in Arlington, Virginia at the PNC Bank located in Washington, DC.

ACCOUNT- 12 was opened with a \$100.00 deposit.

50. On May 4, 2017, **CORNELIOUS** deposited M&T Bank check 1001 in the amount of \$35,420.77, written on ACCOUNT- 11 and made payable to A-L Abatement, Inc., into ACCOUNT- 12 at the PNC Bank located in Oxon Hill, Maryland. Photographs of the individual depositing check number 1001 depict an individual matching the likeness and description of **CORNELIOUS** is pictured in the photograph.

51. Between May 4, 2017 and May 24, 2017, approximately \$35,437.73 was withdrawn from ACCOUNT- 12 in the form of cash withdrawals and four issued PNC cashier's checks.

**NATIVE AMERICAN CONTRACTORS ASSOCIATION INC. CHECKS**  
**M&T BANK – NATIVE AMERICAN CONTRACTORS ASSOCIATION INC.**  
**(ACCOUNT-13)**

52. On or about May 2, 2017, Native American Contractors Association, Inc. purportedly located in Baltimore, Maryland was incorporated with the State of Maryland. The registered agent was listed as Diane Smith, using the same address as the business.

53. On May 8, 2017, an individual purporting to be Diane Smith opened M&T Bank Account ending in 0835 (ACCOUNT-13) in the name of Native American Contractors Association Inc. at the M&T Bank located in Baltimore, Maryland. ACCOUNT- 13 was opened with a \$50.00 deposit.

54. On or about May 8, 2017, check number 000042153, written on the account of Afognak Native Corp in the amount of \$9,148.33 and made payable to Native American Contractors Association was deposited into ACCOUNT- 13 at the M&T Bank located in

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Bethesda, Maryland. A photograph of the deposit transaction depicts an individual matching the likeness and description of **CORNELIOUS**.

55. Diane Smith ("Smith") was interviewed by law enforcement. Smith reported she resides in Pennsylvania. Smith confirmed her true social security number was used to open ACCOUNT- 12 and ACCOUNT- 13. Smith stated she did not authorize anyone to use her name or social security number to open ACCOUNT-12 or ACCOUNT-13. Smith stated she was not associated with and did not file to incorporate A-L Abatement, Inc. or Native American Contractor Association, Inc. Smith stated she did not know anyone by the name Lisa **CORNELIOUS**.

**WELLS FARGO BANK - BROADWAY'S REALTY, INC**


56. On or about July 18, 2017, Broadway's Realty, Inc. purportedly located in Bethesda, Maryland, was incorporated with the State of Maryland. The registered agent was listed as Michelle Offutt, using the same address as the business.

57. On July 25, 2017, **CORNELIOUS**, purporting to be Michelle Offutt, attempted to open a bank account in the name of Broadway's Realty, Inc. at the Wells Fargo Bank located in Bethesda, Maryland. The bank manager recognized **CORNELIOUS** from a photograph in a fraud alert sent from Wells Fargo's fraud department.

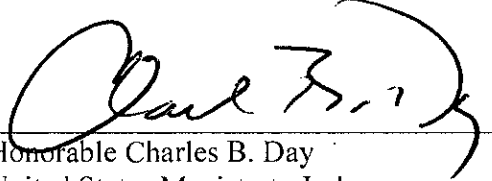
58. The Branch Manager called the Montgomery County Police Department to report a fraud in progress. When Montgomery County Police first encountered **CORNELIOUS**, she initially identified herself as Michelle Offutt and then later as her true name, Lisa **CORNELIOUS**. **CORNELIOUS** was arrested for possession of a fraudulent driver's license and theft related to fraudulent identification information.

### CONCLUSION

59. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that **Lisa Lynette CORNELIOUS** knowingly executed or attempted to execute a scheme or artifice to defraud several financial institutions, in violation of Title 18, United States Code, Section 1344; conspired with another person to commit bank fraud, in violation of Title 18, United States Code, Section 1349; knowingly transferred, possessed, or used, without lawful authority, a means of identification of another person during and in relation to a felony violation, in violation of Title 18, United States Code, Section 1028A; and knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such financial transaction which in fact involves the proceeds of specified unlawful activity with the intent to promote the carrying on of a bank fraud scheme and to conceal or disguise the nature, source or ownership of the proceeds of the bank fraud scheme.

  
NICHOLE RODRIGUEZ  
Postal Inspector  
U.S. Postal Inspection Service

Sworn to before me this 11<sup>th</sup> day of May, 2018.

  
Honorable Charles B. Day  
United States Magistrate Judge